

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF DELAWARE

SARA S. ECHEVARRIA,	:	
	:	
Plaintiff,	:	Case No.: 05-284 (GMS)
	:	
v.	:	Removed from Superior Court,
	:	New Castle County, Delaware
U-HAUL INTERNATIONAL, INC.,	:	C.A. No.: 05C-03-188 WCC
ROGER MAYFIELD, and	:	
NATIONWIDE GENERAL INSURANCE	:	
COMPANY,	:	
	:	
Defendants.	:	

**AFFIDAVIT OF INFORMATION REGARDING
COVERAGE LIMITS UNDER INSURANCE POLICY WITH
REPUBLIC WESTERN INSURANCE COMPANY**

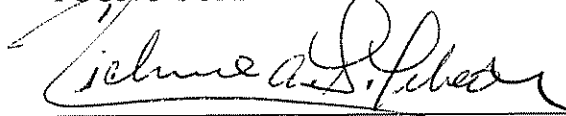
STATE OF DELAWARE)
) SS.
NEW CASTLE COUNTY)

BE IT REMEMBERED that on this 7th day of June, 2005, personally appeared before me, a Notary Public for the State and County aforesaid, the deponent, Richard A. DiLiberto, Jr., Esquire, who deposed and stated as follows:

1. I am an attorney with the law firm of Young Conaway Stargatt & Taylor, LLP, attorneys for the plaintiff in the above-captioned matter.
2. The defendants, U-Haul International, Inc., and Roger Mayfield, are insured under a policy of insurance issued by Republic Western Insurance Company, based upon information and belief.
3. During a telephone conversation, on or about July 22, 2004 with Karen Burczewski, the claims adjuster for Republic Western Insurance Company, handling the claim in the above-captioned matter, I was informed that the coverage limits on the policy covering

Defendants U-Haul and Mayfield are \$15,000 per person and \$30,000 per occurrence or
“minimum coverage.”

YOUNG CONAWAY STARGATT & TAYLOR, LLP



Richard A. DiLiberto, Jr. (#2429)

Jennifer M. Kinkus (#4289)

The Brandywine Building, 17th Floor

1000 West Street

P.O. Box 391

Wilmington, Delaware 19899-0391

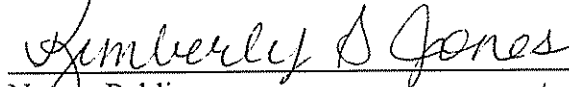
Telephone: (302) 571-6657

Facsimile: (302) 571-1253

Attorneys for Plaintiffs

Dated: June 9, 2005

SWORN TO AND SUBSCRIBED before me this 9th day of June, 2005.



Notary Public

My Commission Expires:

8/8/06

KIMBERLY S. JONES
NOTARY PUBLIC
STATE OF DELAWARE
My Commission Expires Aug. 8, 2006

EXHIBIT B



RECEIVED JUL - 7 2004

Echvarria C

WWW.REPWEST.COM

July 2, 2004

Richard A. DiLiberto, Jr., Esquire
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801

RE: Our Claim: 02393161
Our Insured: Uhaul
Date of Loss: May 15, 2004

Dear Mr. DiLiberto:

We have carefully examined the facts and surrounding circumstances of this matter and believe we have sufficient information with which to make a proper determination of the above claim.

We have endeavored to fairly evaluate all available information connected with this loss however, our investigation reveals no negligence on the part of U-Haul. As a result, we will not be in a position to honor your claim.

Should you have any questions or evidence to the contrary, please feel free to contact the undersigned.

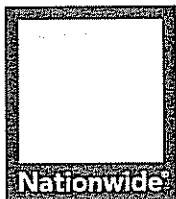
Very truly yours,

A handwritten signature in cursive script that reads 'Karen A. Burczewski'.
Karen A. Burczewski, xt. 232
Claims Adjusters

KAB:s

"Any person who knowingly and with intent to defraud any insurance company or other person files an application for insurance or statement of claim containing any materially false information or conceals for the purpose of misleading, information concerning any fact material thereto commits a fraudulent insurance act, which is a crime and subjects such person to criminal and civil penalties. The lack of a statement as required above does not constitute a defense in any prosecution for a fraudulent insurance act."

EXHIBIT C



910 W. Basin Road, New Castle DE 19720
HOME OFFICE: COLUMBUS, OHIO

January 12, 2005

Republic Western Insurance
P.O. Box 2789
Warminster, PA 18974-2789
Attn: Karen Burczewski

OUR INSURED : Sara S Echevarria
OUR CLAIM NUMBER : 89-07 497126 05152004 01
DATE OF ACCIDENT : 05-15-2004
CLAIMANT NAME : Sara S Echevarria

Dear Ms. Burczewski ,

I appreciate your call regarding the above matter, however, I still request the location of the trailer unit so it may be inspected. If the unit has been disposed of, please confirm this in writing.

You will need to support your contention that the trailer unit was indeed in proper working order and maintained. Irrespective of the information suggesting that the vehicle renter, Roger Mayfield re-hitched the unit, it is notable that he traveled over three hundred miles before the coupling detached. The information we have is that Mayfield had re-attached the hitch in North Carolina, however, this accident occurred in Delaware, which is a rather long distance away from the point of coupling. This suggests that they may have been something more than just a matter of an improper hitching.

Notwithstanding, Mayfield was a renter, and proper instructions should be afforded these persons upon the rental of such units to protect such foreseeable events from occurring. This is a duty of both the leasing agent and the manufacturer. Without the identity of the manufacturer, we are unable to determine if there was appropriate instructions provided for the use and maintenance of the unit. The design of the unit may also be in question as to its useability, and whether or not its design is conducive to its proper use.

If you have the name of the manufacturer of the hitching mechanism, I would appreciate your favoring me with this information so I may research whether any recalls on this mechanism were issued by that manufacturer, NHTSA or other consumer organization.

Please let me hear from you by February 1, 2005 in this regard.

NATIONWIDE GENERAL INSURANCE COMPANY

Sonja Blackhawk
Claims Department
(302)325-8932

cc: Richard DiLiberto, Esq.
1000 West Street
The Brandywine Building
Wilmington DE 19899

EXHIBIT D

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June 9, 2004

Mr. Roger Mayfield
12855 S. Belcher Road
B-8
Largo, FL 33773

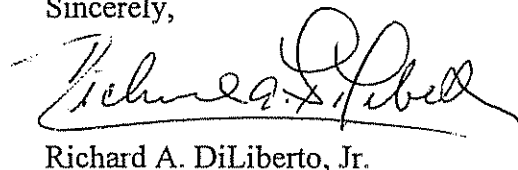
Re: Our Client: Sara S. Echevarria
Date of Accident: 05/15/2004

Dear Mr. Mayfield:

This firm represents Sara Echevarria for personal injuries sustained in an automobile accident involving the U-Haul vehicle you were operating on May 15, 2004. Please notify your insurance company of this claim and request that they contact me as soon as possible.

Thank you for your cooperation.

Sincerely,


Richard A. DiLiberto, Jr.

RAD:md

C

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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July 22, 2004

Mr. Roger Mayfield
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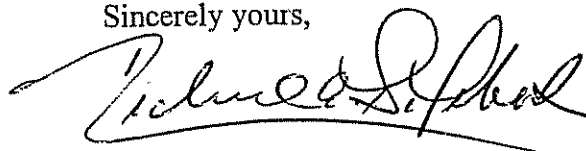
Re: Our Client: Sara S. Echevarria
Date of Accident: 05/15/2004

Dear Mr. Mayfield:

I write to follow-up my letter to you dated June 9, 2004, a copy of which is enclosed.

I have been advised by the insurance company for U-Haul that they are disclaiming coverage for this claim and have advised that your insurance company is responsible for handling this claim. Please contact your insurance company immediately and request that they contact me forthwith.

Sincerely yours,



Richard A. DiLiberto, Jr.

RAD:md

8/26
YOUNG CONAWAY STARGATT & TAYLOR, LLP

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August 12, 2004

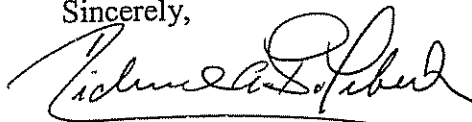
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Date of Accident: 05/15/2004

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Sincerely,



Richard A. DiLiberto, Jr.

RAD:ncp
Enclosure

C

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August 27, 2004

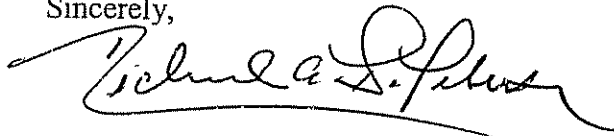
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Date of Accident: 05/15/2004

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Richard A. DiLiberto, Jr.

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